
**TECHNICAL REVIEW DOCUMENT
FOR
RENEWAL OF OPERATING PERMIT 96OPWE128**

to be issued to:

Kodak Colorado Division - Eastman Kodak Co.
Weld County
Source ID 1230003

Prepared by Cathy Rhodes
September, 2003

I. Purpose

This document will establish the basis for decisions made regarding the Applicable Requirements, Emission Factors, Monitoring Plan and Compliance Status of Emission Units covered by the renewal Operating Permit proposed for this site. The original operating permit was issued September 1, 1999 and expires on September 1, 2004. This document is designed for reference during review of the proposed permit by the EPA, the public, and other interested parties. The conclusions made in this report are based on information provided in the renewal application submitted August 29, 2003. Please note that copies of the Technical Review Document for the original permit and any Technical Review Documents associated with subsequent modifications of the original Operating Permit may be found in the Division files as well as on the Division website at <http://www.cdphe.state.co.us/ap/Titlev.html>. This narrative is intended only as an adjunct for the reviewer and has no legal standing.

II. Source Description

This source is classified as a manufacturer of photographic supplies under the Standard Industrial Classification code 3861. The facility uses such processes as plastic extrusion and coating to produce light-sensitive films and papers for use in photography. Two natural gas fired 206 mmBtu/hour steam generators provide building and process heat throughout the facility. Two other boilers are used as back-up sources only.

The facility is located near Windsor, an attainment area for all pollutants. This facility is within 100 km of two Class I areas, Rocky Mountain National Park, and Rawah National Wilderness Area. Wyoming is an affected state within 50 miles of the facility.

Facility emissions are as follows:

	<u>Pollutant</u>	<u>Actual** (tpy)</u>
NO _x	223	129
CO	200	37
VOC	223	54
PM	24	14
PM ₁₀	24	14
HAPs	N/A	22

* Based on permitted emissions.

** Actual emissions are based on the latest APENs on file

II. Discussion of Modifications Made

Source Requested Modifications

The permittee requested the following revisions to the Operating Permit in their renewal application.

Section I

Condition 1.3 – The permittee obtained Construction Permit 96WE473, which combines all applicable requirements from previously issued permits into a single facility wide permit. This condition is revised to delete the list of previous construction permits and replace them with 96WE473.

Condition 2.1 – Revised to reflect the new PSD status of the facility.

Section II

Previous Condition 1 – The periodic monitoring requirements were previously included as Appendix H to the permit. The monitoring requirements are moved to the body of the permit, for each specific permit condition. Therefore previous Condition 1, which referenced Appendix H, is removed. In addition, the following changes were made to the periodic monitoring requirements:

The specific chemical list for each building is removed. Instead, records of types and amounts of chemicals used are required in order to estimate VOC emissions. The calculation procedures previously included methods for estimating HAP emissions. The facility is a major source of HAPs, subject to MACT requirements, and has no facility wide ton/year HAP limit. HAPs must still be estimated annually for APEN and fee purposes, however, the permit no longer indicates how the HAP emissions will be calculated.

The process in Building C-46 no longer uses a powder-based material, therefore the wet scrubber unit is not needed to control PM emissions and scrubber monitoring requirements are removed.

The permittee has indicated that PM emissions from the Building C-50 Chemical Weigh Station are controlled using a HEPA filter, not a bagfilter, as indicated in the original permit. In order to monitor compliance with opacity limits, the revised permit requires replacement of this HEPA filter at least annually.

For VOC emissions, the calculation method for some of the buildings no longer indicates that waste or recycled material will be subtracted in the mass balance equations. Instead, VOC emissions are equal to VOC consumption.

Condition 1 (Table) – Reduce the facility wide emission limit for VOCs from 296.6 tons/year to 223 tons/year. Reduce the facility wide emission limit for NOx from 230 to 223 tons/year. The facility is no longer a major source for Prevention of Significant Deterioration requirements. In addition, these limits are more than 25% below the significant PSD threshold of 250 tons/year, therefore tracking of insignificant activity emissions is not required. Note boiler emissions are still greater than 100 tons/year (the boilers are a listed source for PSD purposes), therefore the boilers are a major source for PSD purposes.

Condition 1.2 – Revised to reflect current Division policy.

Condition 1.3 – Revised to include a more extensive list of items for which records will be kept.

Condition 2 (Table) – Revised to clarify that monitoring for fuel oil use is fuel analysis and recordkeeping and calculation, and that compliance is assumed when natural gas is used.

Condition 3.1.2 – The permittee has performed the required compliance test, therefore the requirement is removed from the permit. During the test, the permittee established a thermal oxidizer temperature that will ensure 97.5% destruction of HAPs. The temperature corresponding to 95% control was not established. Therefore, compliance with the 95% MACT requirement is assumed when the 97.6% temperature is met.

Condition 4 – The permittee obtained Construction Permit 96WE473 in order to make the new VOC and NOx emission limits enforceable. In addition, the Construction Permit allows the construction of a new Coating Line (#292). The Coating Line is subject to the Subpart KK MACT standards. The applicable requirements from the Construction Permit for this new coating line are added to the operating permit in Condition 4. The due date of the first semi-annual monitoring and deviation report required by this operating permit will be more than 180 days after the initial approval construction permit 96WE473 was issued and/or the equipment commenced operation. Therefore, under the provisions of Regulation No. 3, Section V.A.2., the Division is allowing the initial approval construction permit to continue in full force and effect and will consider the Responsible Official certification submitted with that report to serve as the demonstration required pursuant to Regulation No. 3, Part B, Section IV.H. and no final

approval construction permit will be issued. The appropriate provisions of the initial approval construction permit have been directly incorporated into this operating permit.

Section III

General Conditions cites are revised to reflect renumbering after addition of Common Provisions to General Conditions (added for previous modification of permit).

Shield provision for nonattainment requirements of Colorado Regulation No. 7 is added.

Appendix G

The equipment list is updated, and a column is added to indicate the location of the equipment.

Appendices A and G – For Building 29-B, Storage, Making and Process Vessels, Storage Tanks and Parts Washers are removed from the Equipment List in Appendix G and moved to the Insignificant Activity List in Appendix A as “Material Storage Area.”

Other Modifications

In addition to the changes requested by the permittee, the Division has included changes to make the permit consistent with recently issued permits, to include comments made by the EPA on other Operating Permits, to reflect updated and current Regulatory language, as well as to correct errors or omissions identified during review of this renewal.

The Division has made the following revisions, based on recent internal permit processing decisions and EPA comments, to the Kodak Colorado Division Operating Permit:

Section I

Condition 5 is added for compliance assurance monitoring (CAM) provisions.

Section II

Condition 3.1 – Revised to require the use of appropriate ASTM methods for fuel sampling. The list of specific ASTM methods is removed.

Section V – Permit Shield

The Title for Condition 1 is changed from “Specific Conditions” to “Specific Non-Applicable Requirements.”

For P070, Justification language is revised to address EPA comments, language related to modification or reconstruction is removed.

Appendices

The EPA addresses in Appendix D are updated.

III. Compliance Assurance Monitoring (CAM)

The #291 Coating Line is equipped with a thermal oxidizer to control VOC and HAP emissions. Likewise, the #292 Coating Line will be equipped with a thermal oxidizer. Emission points that use a control device to achieve compliance with an emission limitation or standard and have precontrolled emissions that exceed or are equivalent to the major source threshold are subject to the CAM provisions at time of permit renewal, unless they qualify for an exemption. Emission limitations or standards proposed by the EPA after November 15, 1990 under the NSPS or MACT provisions are exempt from the CAM requirement. The Coating Lines are subject to the MACT standard for the Printing and Publishing Industry, therefore the MACT standard is not subject to the CAM requirements. In addition, an emission limitation or standard for which the originally issued operating permit requires a continuous compliance determination method is exempt. The originally issued operating permit requires a continuous temperature monitoring device to ensure compliance with the HAP and VOC emission limits, therefore the Coating Lines are not subject to CAM provisions for the VOC emission limit.

IV. Maximum Achievable Control Technology (MACT)

The EPA recently promulgated the following MACT standards to which this facility may be subject: Subpart JJJJ – Paper & Other Web Surface Coating; Subpart HHHHH – Miscellaneous Coating Manufacturing; Subpart FFFF – Miscellaneous Organic Chemical Manufacturing; and Subpart DDDDD – Industrial, Commercial and Institutional Boilers and Process Heaters. The permittee is in process of determining the applicability of these standards to this facility. At this time, it appears the facility may be exempt from Subpart JJJJ, because Subpart JJJJ exempts sources subject to Subpart KK. In addition, it appears the boilers are subject to Subpart DDDD, although under Subpart DDDD, the boilers are not subject to any emission standard. Within 18 months of promulgation of a new applicable requirement, the Division must include the new requirements in the operating permit. Once the permittee determines the applicability of these standards, the Division will incorporate the provisions into the operating permit using the applicable provisions of Regulation No. 3, Part C. This may require reopening of the permit, including public notice and EPA review. Each of these MACT standards set forth the date by which the permittee must submit the required initial notification.